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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SOCORRO COOPER,

Plaintiff,

vs.

UNITED STATES OF AMERICA;

Defendants.

CASE NO.:2:17-cv-02484-APG-VCF

STIPULATION AND ORDER TO EXTEND EXPERT DISCLOSURES (FIRST REQUEST)

Plaintiff SOCORRO COOPER (hereinafter “Plaintiff”) and Defendant UNITED STATES OF AMERICA, by and through their respective counsel of record, do hereby stipulate to extend the initial expert disclosure deadline and rebuttal expert disclosure deadline.

Pursuant to Local Rule 6-1(b), the parties hereby aver that this is the first such discovery extension requested in this matter.

DISCOVERY COMPLETED TO DATE

The parties have conducted an FRCP 26(f) conference and have served their respective FRCP 26(a) disclosures and supplements thereto;

Plaintiff has served upon Defendant one set of Interrogatories and one set of Request for

1 Production of Documents. Defendant has submitted timely responds to said written discovery;
2 Defendant has served upon Plaintiff one set of Interrogatories and one set of Request for
3 Production. Plaintiff has submitted timely responses to each set of written discovery;

5 Judge Mahan's deposition took place on March 22, 2018;

6 Witness Michael Donald's deposition took place on May 3, 2018;

7 Plaintiff's deposition is scheduled for May 30, 2018;

8 **DISCOVERY TO BE COMPLETED AND REASONS FOR EXTENSION OF**
9 **DISCOVERY**

10 Discovery to be completed includes:

- 11 1. Additional written discovery (if necessary);
- 12 2. Depositions of Plaintiff scheduled on May 30, 2018;
- 13 3. Depositions of additional witnesses;
- 14 4. Depositions of expert witnesses and rebuttal expert witnesses;
- 15 5. Plaintiff to notice Defendant's 30(b)(6) deposition;
- 16 6. Site Inspection scheduled on May 14, 2018

17 The parties aver, pursuant to Local Rule 6-1, that good cause exists for the requested
18 extension. The parties agree that, pending this Court's approval, extension of the expert
19 disclosure deadlines is appropriate. The parties wish to extend initial expert disclosure deadlines
20 and rebuttal expert disclosure deadlines by 30 days so that both may have time to conduct expert
21 depositions.

22 **PROPOSED NEW DISCOVERY DEADLINES**

23 Initial Expert Disclosure Deadline June 11, 2018

24 Rebuttal Expert Disclosure Deadline July 11, 2018

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If this extension is granted, all anticipated additional discovery should be concluded within the stipulated extended deadline. The parties aver that this request for extension of expert deadlines is made by the parties in good faith and not for the purpose of delay.

Dated this 4th day of May, 2018.

Dated this 4th day of May, 2018.

RICHARD HARRIS LAW FIRM

/s/ Samantha A. Martin

/s/ Katherine R. Branch

SAMANTHA A. MARTIN, ESQ.
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Attorney for the United States

ORDER

IT IS SO ORDERED this 7th day of May, 2018.


UNITED STATES MAGISTRATE JUDGE

Submitted by:

RICHARD HARRIS LAW FIRM

/s/ Samantha A. Martin

SAMANTHA A. MARTIN, ESQ.
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Attorneys for Plaintiff

The following deadlines apply:

Discovery Cut-Off Date: **August 10, 2018**

Amending Pleadings: Deadline passed and will not be extended.

Initial Expert Disclosure Deadline: **June 11, 2018**

Rebuttal Expert Disclosure Deadline: **July 11, 2018**

Interim Status Report: **June 11, 2018**

Dispositive Motions: **September 10, 2018**

Pretrial Order: **October 10, 2018**

In the event dispositive motions are filed, the date for filing the joint pretrial order shall be suspended until thirty (30) days after decision of the dispositive motions or further order of the Court.